

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

DOROTHY K. MARTIN,

Plaintiff

v.

AVANT PUBLICATIONS, LLC,  
d/b/a TIMES LEADER  
d/b/a TIMES LEADER MEDIA GROUP

Defendant

:  
:  
: Civil Action No. 3:22-CV-00276  
:  
: Jury Trial Demanded  
:  
: The Honorable Robert D. Mariani  
:  
:  
: (Electronically Filed)

**JOINT MOTION  
FOR EXTENSION OF DISCOVERY AND RELATED DEADLINES**

Pursuant to Rule 7.1 of the Local Rules of Court, the parties, by and through their counsel, Borland & Borland, L.L.P. and Kimberly D. Borland, Esquire for Plaintiff; and Vinsko & Associates, P.C. and William E. Vinsko, Jr., Esquire for Defendant, hereby move for an Order extending the discovery deadline and all other pretrial deadlines in the above-captioned matter and, in support thereof, aver as follows:

1. The current discovery deadline in this matter is December 31, 2023.
2. The parties have cooperated with each other and have voluntarily exchanged relevant documentation and information, written discovery requests and responses and have taken the depositions of witnesses.
3. Defendant wishes to take the deposition of Plaintiff, which could not be scheduled previously, because of the respective schedules of the parties and their counsel.

4. Plaintiff wishes to take the deposition of Kourtney Richards, Defendant's former director of human resources, who is no longer employed by Defendant and does not reside in Pennsylvania.

5. Counsel for the parties are cooperating in the scheduling of Ms. Richards' deposition, but her availability is currently unknown.

6. In order to allow the parties sufficient time to complete discovery, it is requested that the discovery and other pre-trial deadlines be extended for a period of approximately ninety (90) days, as follows:

Discovery Deadline: July 31, 2024

Expert Discovery Deadline: October 15, 2024

Plaintiff's Expert Witness Deadline: July 31, 2024

Defendant's Expert Witness Deadline: August 30, 2024

Supplemental Reports Deadline: September 15, 2024

Dispositive Motions Deadline: August 30, 2024

Party Joinder Deadline: July 31, 2024

Pleading Amendment Deadline: July 31, 2024

7. Granting this request for an enlargement of time will not prejudice any party or unduly delay the disposition of this matter, but rather will facilitate the discovery process.

8. Both Counsel concur in this request.

Respectfully submitted,  
/s/ KIMBERLY D. BORLAND, ESQUIRE  
Attorney ID #23673

Borland & Borland, L.L.P.  
11<sup>th</sup> Floor, 69 Public Square  
Wilkes-Barre, PA 18701  
570-822-3311  
kborland@borlandandborland.com

Attorney for Plaintiff

**CERTIFICATE OF CONCURRENCE**

I, Kimberly D. Borland, Esquire, do hereby certify that William E. Vinsko, Jr., Esquire, attorney for Defendant, concurs in the granting of the relief requested in the foregoing Motion.

Respectfully submitted,  
/s/ KIMBERLY D. BORLAND, ESQUIRE  
Attorney ID #23673

Borland & Borland, L.L.P.  
11<sup>th</sup> Floor, 69 Public Square  
Wilkes-Barre, PA 18701  
570-822-3311  
kborland@borlandandborland.com

Attorney for Plaintiff